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10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 **GGCC, LLC**, an Illinois Limited  
13 Liability Company, Individually and on  
Behalf of All Others Similarly Situated,

14 Plaintiffs,

15 v.

16 **DYNAMIC LEDGER SOLUTIONS,**  
17 **INC.**, a Delaware Corporation, **TEZOS**  
18 **STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, and **ARTHUR BREITMAN**,  
an Individual,

19 Defendants.

Case No: 3:17-cv-06779-RS

**[PROPOSED] ORDER GRANTING  
GGCC GROUP'S MOTION FOR  
CONSOLIDATION, APPOINTMENT  
OF LEAD PLAINTIFF AND  
APPROVAL OF LEAD COUNSEL  
SELECTION**

20 **ANDREW OKUSKO**, individually and  
21 on behalf of all others similarly situated,

22 Plaintiff,

23 v.

24 **DYNAMIC LEDGER SOLUTIONS,**  
25 **INC., THE TEZOS FOUNDATION,**  
**KATHLEEN BREITMAN, ARTHUR**  
26 **BREITMAN, and TIMOTHY**  
**DRAPER,**

27 Defendants.

Case No: 3:17-cv-06829-RS

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28 **[PROPOSED] ORDER GRANTING GGCC GROUP'S  
MOTION FOR CONSOLIDATION, LEAD PLAINTIFF,  
AND LEAD COUNSEL**

No. 5:17-cv-06779-RS

**ANDREW BAKER**, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, **ARTHUR BREITMAN**, an  
Individual, **JOHANN GEVERS**, an  
individual, **STRANGE BREW  
STRATEGIES, LLC**, a California  
limited liability company, and **DOES 1  
through 100 inclusive**,

Defendant.

Case No. 3:17-cv-06850-RS

**BRUCE MACDONALD**, Individually  
and on Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, **ARTHUR BREITMAN**, an  
Individual, **TIMOTHY COOK  
DRAPER**, an individual, **DRAPER  
ASSOCIATES**, **JOHANN GEVERS**,  
**DIEGO PONZ**, **GUIDO  
SCHMITZKRUMMACHER**,  
**BITCOIN SUISSE AG**, **NIKLAS  
NIKOLAJSEN**, and **DOES 1-100,  
INCLUSIVE**,

Defendants.

Case No. 3:17-cv-07095-JSC

Pursuant the Securities Act of 1933 as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 77z-1(a)(3), Rule 42 of the Federal Rules of Civil Procedure, and the Court’s *Model Order for Securities Fraud Class Actions*, the Court hereby orders as follows:

# **I. CONSOLIDATION OF RELATED ACTIONS**

The actions *GGCC, LLC v. Dynamic Ledger Solutions, Inc., et al.*, No. 5:17-cv-06779-RS (the “GGCC Action”), *Okusko v. Dynamic Ledger Solutions, Inc., et al.*, No. 3:17-cv-06829-RS (the “Okusko Action”), and *Baker v. Dynamic Ledger Solutions, Inc., et al.*, No. 3:17-cv-06850-RS (the “Baker Action”) are hereby consolidated into Civil Action No. 5:17-cv-06779-RS for pretrial proceedings before this Court. The consolidated action shall be captioned: “*In re Tezos ICO Securities Litigation.*”

All related actions that are subsequently filed in, or transferred to, this District shall be consolidated into this action for pretrial purposes. This Order shall apply to each such related action, absent order of the Court. A party that objects to such consolidation, or to any other provision of this Order, must file an application for relief from this Order within thirty (30) days after the date on which a copy of the order is mailed to the party’s counsel.

This Order is entered without prejudice to the rights of any party to apply for severance of any claim or action, for good cause shown.

## **MASTER DOCKET AND CAPTION**

The docket in Civil Action No. 5:17-cv-06779-RS shall constitute the Master Docket for this action.

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Every pleading filed in the consolidated action shall bear the following caption

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**IN RE TEZOS ICO SECURITIES  
LITIGATION**

Master File No: 5:17-cv-06779-RS

CLASS ACTION

**This Document Relates To:**

**[Document Title]**

The file in Civil Action No. 5:17-cv-06779-RS shall constitute a Master File for every action in the consolidated action. When the document being filed pertains to all actions, the phrase “All Actions” shall appear immediately after the phrase “This Documents Relates To:”. When a pleading applies only to some, not all, of the actions, the document shall list, immediately after the phrase “This Documents Relates To:”, the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action.

The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12 whenever a case that should be consolidated into this action is filed in, or transferred to, this District. If the Court determines that the case is related, the clerk shall:

- (a) place a copy of this Order in the separate file for such action;
- (b) serve on plaintiff's counsel in the new case a copy of this Order;
- (c) direct that this Order be served upon defendants in the new case; and
- (d) make the appropriate entry in the Master Docket.

**II. APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL**

Having found that the GGCC Group has the largest losses and also satisfies the requirements of Rule 23, the Court hereby appoints the GGCC Group (GGCC, LLC, Pumaro, LLC and Nick Anthony) as Lead Plaintiff for a class of all United States

1 persons or entities who invested in the Tezos Initial Coin Offering from within the  
2 United States.

3 Having found that the GGCC Group's choice of counsel, The Restis Law Firm,  
4 P.C. and Lite DePalma Greenberg, LLC ("Restis Law" and "Lite DePalma") will  
5 adequately represent the interests of the proposed class, the Court hereby appoints  
6 Restis Law and Lite DePalma as Co-Lead Plaintiff's Counsel for the class.

7 Lead Plaintiff's Counsel shall have authority to speak for, and enter into  
8 agreements on behalf of, plaintiffs in all matters regarding pretrial procedures,  
9 discovery, and settlement negotiations. Lead Plaintiff's Counsel shall manage the  
10 prosecution of this litigation to avoid duplicative or unproductive activities. Lead  
11 Plaintiff's Counsel shall be responsible for coordination of all activities and appearances  
12 on behalf of plaintiffs and for dissemination of notices and orders. Lead Plaintiff's  
13 Counsel shall be responsible for communications with the Court. Lead Plaintiff's  
14 Counsel shall maintain a master service list of all parties and counsel.

15 Defendants' counsel may rely upon agreements made with Lead Plaintiff's  
16 Counsel. Such agreements shall be binding on all plaintiffs.

17 Any counsel of record for a party in this action who is not a member of the Bar  
18 of this District is hereby admitted to practice pro hac vice in this action.

### 19 **III. PLEADINGS AND MOTIONS**

20 Defendants are not required to respond to the complaint in any action  
21 consolidated into this action, other than a consolidated complaint or a complaint  
22 designated as the operative complaint.

23 Lead Plaintiff shall file a consolidated complaint within thirty (30) days after  
24 filing the order designating the Lead Plaintiff, unless otherwise agreed upon by the  
25 parties. The consolidated complaint shall be the operative complaint and shall supersede  
26 all complaints filed in any of the actions consolidated herein.

1 Defendants shall respond to the consolidated complaint within thirty (30) days  
2 after service, unless otherwise agreed upon by the parties. If defendants file any motions  
3 directed at the consolidated complaint, the opposition and reply briefs shall be filed  
4 within thirty days and forty-five days, respectively, of that response, unless otherwise  
5 agreed upon by the parties.

6 The parties shall serve all papers on each other by hand, by overnight delivery,  
7 or (by prior agreement) by facsimile, unless otherwise agreed upon by the parties.  
8 Notwithstanding the foregoing, defendants may serve plaintiffs' counsel, other than  
9 Lead Plaintiff's Counsel, by first-class mail, unless otherwise agreed upon by the  
10 parties.

11 Plaintiffs shall file a motion for class certification within thirty (30) days after  
12 service of the consolidated complaint. Counsel shall propose to the Court a mutually  
13 agreeable schedule for class certification discovery and for briefing and hearing of such  
14 motion.

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16 Dated: \_\_\_\_\_

By: \_\_\_\_\_  
Honorable Richard Seeborg  
United States District Judge